

Douglas D. Orvis II  
Direct Phone: 202.373.6041  
Direct Fax: 202.373.6001  
douglas.orvis@bingham.com  
Our File No.: 0000324890

November 9, 2007

## VIA ECFS

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Portals  
Washington, D.C. 20554

### **Re: WC Docket No. 02-60, Rural Health Care Support Mechanism, Ex Parte Communication**

Dear Ms. Dortch:

In a recent meeting, Iowa Health System (“IHS”) discussed the benefits of its pending application for support under the Commission’s Rural Health Care Pilot Program (“Pilot Program”). In particular, IHS noted during the meeting that its application was unique in that it requests funding only for the access, or “last mile” facilities of its already operational dedicated health care backbone network. As a result, the application is completely “scalable” insofar as IHS could receive a portion of its initial grant request and still achieve the objectives identified in the application and provide improved access to tele-medicine and tele-health to rural citizens of Iowa.

In its Application, IHS identified 78 hospitals, clinics and other medical facilities that were within a mile of the IHS backbone network and were potential connection points for the IHS network. In the Application and again in IHS’s August 7, 2007 ex parte letter, IHS noted that, due to the timing of the Commission’s deadline for the filing of the Application, there was not sufficient time to receive full commitments from all of the identified connections at the time the Application was due. As of today, IHS has received 30 firm commitments from different facilities, with two-thirds of these commitments coming from rural providers.

These 30 commitments represent 3,682 beds. A list of these 30 firmly committed facilities is attached to this letter. To fund the access connections for these 30 facilities, IHS projects that these connections will require a grant under the Pilot Program of \$3,603,135. As a reminder, the Application requested \$7,802,732 to provide access to all 78 of the originally identified facilities.<sup>1</sup>

<sup>1</sup> Generally, decreasing the number of connections to a network will typically increase the marginal costs of the remaining connections, although the specific geographic location of each connection (i.e., proximity to existing backbone network) also plays a significant role.

Boston  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Walnut Creek  
Washington

Bingham McCutchen LLP  
2020 K Street NW  
Washington, DC  
20006-1806

T 202.373.6000  
F 202.373.6001  
bingham.com

Marlene H. Dortch  
November 9, 2007  
Page 2

As noted in the Application, IHS intends to facilitate the access to the network using the more cost effective approach of either newly acquired or built fiber or leased circuits. The attachment also identifies whether the IHS believes owned or leased fiber is the most cost-effective approach. As stated in the August 7 letter, IHS is committed to complying the Commission's competitive bid requirements, and thus the actual costs for connecting the these facilities to the network may be less when telecom entities have the opportunity to competitively bid to provide the access circuits.

IHS continues to believe that the full amount of its requested support will provide the greatest benefit to Iowans. IHS realizes, however, that the Commission is considering numerous applications and may not be able to fully fund all requests. Because the IHS project involves increasing access to an existing operational network, the project can still provide the benefits of the program to many Iowans even if the Commission cannot provide full funding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Douglas D. Orvis II', is written over the typed name.

Douglas D. Orvis II

cc: Jeremy Marcus  
Elizabeth Verlanoti  
Jennifer Prime  
Sabra Roesner

Enclosure

## Committed Healthcare Facilities

| Number | Hospital                               | City           | Connection |
|--------|--|----------------|------------|
| 1      | Allen Hospital                         | Waterloo       | Fiber      |
| 2      | Iowa Lutheran Hospital                 | Des Moines     | Fiber      |
| 3      | Iowa Methodist Medical Center          | Des Moines     | Fiber      |
| 4      | Saint Luke's Hospital                  | Cedar Rapids   | Fiber      |
| 5      | Saint Luke's Regional Medical Center   | Sioux City     | Fiber      |
| 6      | The Finley Hospital                    | Dubuque        | Fiber      |
| 7      | Trinity Regional Medical Center        | Moline         | Fiber      |
| 8      | Trinity Terrace Park Campus            | Fort Dodge     | Fiber      |
| 9      | Trinity West Campus                    | Bettendorf     | Fiber      |
| 10     | Trinity 7th Street Campus              | Rock Island    | Fiber      |
| 11     | Broadlawns Medical Center              | Des Moines     | Fiber      |
| 12     | Buena Vista Regional Medical Center    | Storm Lake     | Leased     |
| 13     | Cass County Memorial Hospital          | Atlantic       | Fiber      |
| 14     | Clarke County Hospital                 | Osceola        | Leased     |
| 15     | Community Memorial Hospital - Sumner   | Sumner         | Leased     |
| 16     | Dallas County Hospital                 | Perry          | Fiber      |
| 17     | Greater Regional Medical Center        | Creston        | Leased     |
| 18     | Greene County Medical Center           | Jefferson      | Leased     |
| 19     | Grundy County Memorial Hospital        | Grundy Center  | Fiber      |
| 20     | Guthrie County Hospital                | Guthrie Center | Fiber      |
| 21     | Guttenberg Municipal Hospital          | Guttenberg     | Leased     |
| 22     | Henry County Health Center             | Mount Pleasant | Fiber      |
| 23     | Humboldt County Memorial Hospital      | Humboldt       | Fiber      |
| 24     | Jackson County Public Hospital         | Maquoketa      | Fiber      |
| 25     | Jones Regional Medical Center          | Anamosa        | Fiber      |
| 26     | Loring Hospital                        | Sac City       | Leased     |
| 27     | Marshalltown Medical & Surgical Center | Marshalltown   | Fiber      |
| 28     | Mary Greeley Medical Center            | Ames           | Fiber      |
| 29     | Ottumwa Regional Health Center         | Ottumwa        | Fiber      |
| 30     | Pocahontas Community Hospital          | Pocahontas     | Leased     |